

## What this Privacy Notice covers

This Privacy Notice gives you information about how Abacus Data and Mailing Limited (“**Abacus**”) treats the personal information which we hold about you.

Please read the following sections carefully to understand how your personal information will be used and handled by Abacus.

Abacus collects and uses your data in accordance with current data protection law (which includes, from 25 May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679)) (“**data protection law**”).

## Who we are

The data controller with control of your personal information is Abacus Data and Mailing Limited.

Our registered office is at:

Unit 9c

Britannia Estates

Leagrave Road

Luton

LU3 1RJ

**Company No. 7457007.**

Abacus’s Data Protection Officer is Martin Davies. He is the person appointed to lead data protection compliance for us. Martin can be contacted on: Tel: 01582 702702 or by email to [Dataprotection@abacusuk.com](mailto:Dataprotection@abacusuk.com)

Our Website may, from time to time, contain links to and from the websites of third parties. Please note that those websites will have their own privacy policies and Abacus does not accept any responsibility or liability for such policies/websites. Please check these other policies before submitting personal information to those websites.

## Information: Collection, Use and Grounds for Processing

Abacus collects and processes information about you from a variety of sources. These are summarised below:

### **i. Information you give to us**

This includes information about yourself which you provide to us by email, letter, telephone, via our website or in person.

The information you give us **may** include (but is not limited to) your:

- name,
- home and/ or business address as appropriate,
- email address,
- phone number,
- (if you are a customer, supplier or contractor of ours) bank details,

**We process this information to:**

- supply you with details of our services or other information where you have requested these from us;
- carry out services with you, where you are an employee, a sub-contractor or are otherwise working with us under another company's terms and conditions;
- supply you with the services you (or your employer) have purchased or requested from us (including taking pre-contractual steps such as providing you with a price quote). This includes us maintaining a database of customer contacts (including emergency contacts) as part of the service we provide;
- manage your (or your employer's) account with us where you are the named contact;
- comply with our record keeping and regulatory compliance obligations;
- where you have opted to receive the same, or where we have a legitimate interest to do so, send you marketing communications concerning our product and service offerings;
- Account management;
- Supporting network and system security;
- Auditing;
- Detecting and preventing fraud;
- Complying with legal obligations;
- Conducting web analytics; or
- Otherwise engage with you where none of the above applies.

We process this information on the following grounds:

- because the processing is necessary for us to provide you (or your employer) with the information or services requested from us, including us carrying out any pre-contractual steps we have instructed to take;
- because, where you are our supplier or a contractor of ours, processing that information is necessary for us to administer the contract (including any pre-contractual steps) between us;
- because, in certain cases, the processing is necessary for us to comply with our legal obligations, for example (but not limited to) where regulations oblige us to keep records of our customers' details and account information;
- because we have a legitimate business interest in sending you news and information about our business and that interest is not overridden by your interests and fundamental rights and freedoms (for example because you can opt-out of such materials at any time);
- because we have a legitimate business interest in processing your personal data and that interest is not overridden by your interests and fundamental rights and freedoms; and
- in the event of a dispute arising between us (or your employer and us) we have a legitimate interest in processing your personal information to resolve that dispute and we are satisfied

that your interests and fundamental rights and freedoms do not override our interest in doing so.

## **ii. Information provided by third parties**

This relates to circumstances where a third party sends us information about you, particularly, for example, where:

- we are taking references;
- we are carrying out credit references;
- you are a sub-contractor or agency worker and your employer or recruitment agency sends us your details. This will usually be the case where you are an employee and your employer sends us your details as a point of contact for the business

The information about you which we receive from third parties may include (but is not limited to) your name, address, email address, phone number and (if you are a customer, supplier or contractor of ours) bank details; criminal convictions/driving offences, credit and employment references.

We process this information for the same reasons as we do for '*information provided by you*' above. Our grounds for processing this information are also the same as our grounds for processing information provided by you directly. Please refer to the previous section '*i. Information you give us*' for more information.

## **iii. Information we collect about you**

Through our website, we collect non-personally identifying information which web browsers and servers typically make available. This includes technical information, such as your IP address, your login information and information about your visit, such as records of how you navigate the pages on our site and how you interact with the pages. For details on how we use cookies, please see our '*Cookies*' section below.

We process this information to ensure that content from our website is presented in the most effective manner for your device and to collect anonymous statistical data in order to improve our services.

### How long we keep your information for

We only keep your information for so long as is reasonably necessary. Please refer to our Data Retention Policy.

These periods may be extended if, for example, there is a legal dispute between us (or your employer and us) or where we reasonably believe a longer retention period is justified. We may also keep your information for longer if we are required by law to do so.

### How we share your information

Your personal information is not shared with any third parties except where we are required to do so to comply with the law, to protect our rights or to perform our contractual obligations to you.

To achieve this, your information will be shared with the following groups of people:

- If you are a customer or a customer contact then we may share your contact details with third parties that help with the fulfilment of your contract (such as sub-contractors,

accountants, bank etc), credit reference agencies, our trusted third party providers and other third parties where we are contractually obliged to do so. We ensure that all of our third party providers are under strict obligations to keep your information secure and confidential.

- If you are an employee of a customer of ours then we may share your information with your employer. Similarly, if you are a sole trader or partner in a business partnership then we may share your information with your employees. This is only done to the extent necessary for us to properly provide our services. We may also share this information internally within Abacus and where a third party is carrying out services on our behalf.
- Our IT providers will sometimes be given access to our contact database in order to monitor, maintain and improve our IT systems. Our IT providers have a strict contractual obligation to handle your information in accordance with data protection law and to keep it confidential at all times.
- We may, on occasion, share your information with our professional advisers.
- We will share your information with third parties where we are legally required to do so – for example, the police in the event of an accident or claim, our insurance providers in the same instance, our bank for financial admin, all government regulators which require us to do so.
- Potential seller or buyer In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Abacus or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

We do not share your information with third parties for marketing purposes.

#### Automated decision making

Abacus does not carry out any automated decision making or profiling using your personal information.

#### Your rights

Under data protection law you have the following rights which you can exercise by contacting us:

- the right to be told what we do with your information. This includes, but is not limited to, the right to know what information we gather, process and store, what we do with it, who we share it with and how long we keep it for. This information is set out in this Privacy Notice, as updated from time to time;
- where we are processing your information on the grounds of your consent, you have the right to withdraw that consent at any time. For the avoidance of doubt, Abacus does not currently process your information on the basis of consent;

- the right to access a copy of your information which we hold. This is called a ‘subject access request’. Additional details on how to exercise this right are set out in the ‘*Access to Information*’ section, below;
- in certain circumstances, the rights to request that we erase, rectify, cease processing and/or delete your information where the original purpose for which the data was collected has expired;
- in certain circumstances, the right to request copies of the information we hold about you in a machine readable format so that you can transfer it to other services;
- the right to object to processing of your information where it is likely to cause or is causing damage or distress;
- the right to prevent us processing your information for direct marketing purposes. We will usually inform you (before collecting your information) if we intend to use your information for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your information, clicking the unsubscribe link in marketing emails we send you or by contacting us using the details set out at the end of this Privacy Notice;
- the right to object to decisions being made about you by automated means. For the avoidance of doubt, Abacus does not use automated decision making at this time;
- the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate; and
- the right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law.

You also have the general right to complain to us (in the first instance) and to the Information Commissioner’s Office (if you are not satisfied by our response) if you have any concerns about how we hold or process your information. Our contact details are set out at the end of this Privacy Notice. The Information Commissioner’s Office website is [www.ico.org.uk](http://www.ico.org.uk).

For further information on your rights under data protection law and how to exercise them, you can contact Citizens Advice Bureau ([www.citizensadvice.org.uk](http://www.citizensadvice.org.uk)) or the Information Commissioner’s Office ([www.ico.org.uk](http://www.ico.org.uk)).

#### Access to information

Under data protection law you can exercise your right of access by making a written request to receive copies of some of the information we hold on you.

You must send us proof of your identity, or proof of authority if making the request on behalf of someone else, before we can supply the information to you.

#### **From 25 May 2018 you will:**

- will be allowed to be charged for our reasonable administrative costs in collating and providing you with details of the information we hold about you if your request is clearly unfounded or excessive; and

- in certain circumstances, be entitled to receive the information in a structured, commonly used and machine readable form.

### Data security

Unfortunately, the transmission of information via the internet is not completely secure. Although Abacus does its best to protect your personal information, we cannot guarantee the security of your data transmitted to our Website. Any transmission is at your own risk.

### IP Addresses and Cookies

Abacus may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and management. This is statistical data about users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

Cookies help us to improve our website and deliver a better and more personalised service; to allow us to estimate audience size and usage pattern; to store information about your preferences and so allow our website to be customised according to your individual interests; to speed up your searches; and to recognise you when you return to our website.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our website's system will issue cookies when you access our website.

**When using Google Analytics and AdWords Abacus always abide by Google's Privacy Policy.**

### Changes to our Privacy Notice

Any changes made to this Privacy Notice in the future will be posted on the Website and, where appropriate, notified to you by email. It is recommended that you visit this page from time to time to review any changes. This Privacy Notice was last updated on 21 May 2018.

### Contact

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to Martin Davies, Abacus Data and Mailing Limited, Unit 9c Britannia Estates, Leagrave Road, Luton LU3 1RJ. Tel: 01582 702702 or by email to **[Dataprotection@abacusuk.com](mailto:Dataprotection@abacusuk.com)**